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11 *Attorneys for the United States*

12
13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 HAROLD HOLMES, individually,

16 Plaintiff,

17 v.

18 SETH JAMES BROWN, individually;
19 DOES I – X and ROE CORPORATIONS I
20 – X, inclusive,

21 Defendants.

22 Case No. 2:23-cv-01487-APG-VCF

23 **Stipulation and Order**

24 **(First Request)**

25 Following the United States' removal of this case from Nevada state court and the
26 United States' substitution as the defendant in place of Seth James Brown by operation of
27 law under 28 U.S.C. § 2679(d)(2), the parties hereby stipulate to extend the time for the
28 United States to file an Answer or otherwise respond to Plaintiff's Complaint to November
1, 2023, which is 60 days after the filing of the Petition for the removal of this case from
state court (ECF No. 1).

29 This extension will allow undersigned counsel adequate time to receive and review
30 any file materials or information from the client agency, the United States Air Force.

31 Undersigned defense counsel has consulted with Plaintiff's counsel, Mr. Randall,
32 who advises that he does not object to the request for extension requested herein.

1 For the above reasons, Defendant United States respectfully requests this extension
2 of time, to November 21, 2023, to file an Answer or otherwise respond to Plaintiff's
3 Complaint.

4 This stipulated request is filed in good faith and not for the purposes of undue delay.

5 Respectfully submitted this 3rd day of October 2023.

6 ER INJURY ATTORNEYS

JASON M. FRIERSON
7 United States Attorney

8 /s/ Justin G. Randall
9 JUSTIN G. RANDALL, ESQ.
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10 1700 S. Pavilion Center Drive Ste #530
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11 *Attorney for Plaintiff*

/s/ R. Thomas Colonna
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12 IT IS SO ORDERED:
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15 UNITED STATES MAGISTRATE JUDGE
16 DATED: 10-6-2023
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